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Hon. Geoffrey W. Crawford
U.S. District Court
11 Elmwood Avenue
Burlington, VT 05401

Dear Judge Crawford:

Re: Reinhardt, et al. v. City of Buffalo, New York, et al.
Index No.: 21-CV-206
Our File No.: 5662.28619

Plaintiffs respectfully submit this letter pursuant to Local Rule 7(a)(2)(C) to request leave to file a memorandum of law in support of their motion for summary judgment that exceeds the default 25-page limit.

Plaintiffs intend to move for summary judgment on numerous claims under 42 U.S.C. § 1983 and state law, including unreasonable search, excessive force, false imprisonment, failure to intervene, conspiracy, and *Monell* liability against the City of Buffalo. In support of each claim, Plaintiffs will cite extensive video and testimonial evidence establishing the Defendants' liability as a matter of law.

Given the number of claims at issue and the volume of supporting evidence, Plaintiffs require more than the 25 pages allotted for opening memoranda under the Local Rules in order to thoroughly brief these issues for the Court. Plaintiffs' counsel has endeavored to be as concise as possible while still fully presenting the grounds for summary judgment. However, a memorandum of up to 55 pages is necessary to clearly set forth Plaintiffs' legal arguments on each claim and explain the pertinent factual evidence in appropriate detail.

This additional length will enable Plaintiffs to cogently demonstrate why the uncontested record entitles them to judgment as a matter of law and assist the Court in evaluating the merits. Therefore, Plaintiffs respectfully request leave to file a memorandum of law in support of their summary judgment motion not to exceed 55 pages.

Respectfully submitted,

s/Chad A. Davenport

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